

**IN THE UNITED STATES DISTRICT
COURT FOR THE SOUTHERN DISTRICT
OF TEXAS, HOUSTON DIVISION**

ACA INTERNATIONAL

and

SPECIALIZED COLLECTION
SYSTEMS, INC.

Plaintiffs,

v.

CONSUMER FINANCIAL PROTECTION
BUREAU; and ROHIT CHOPRA, in his
official capacity as Director of the Consumer
Financial Protection Bureau,

Defendants.

Case No. 4:25-cv-00094

ORDER FOR PRELIMINARY INJUNCTION

THIS MATTER comes before the Court on the Motion on Application for Preliminary Injunction (“Motion”) filed by Plaintiffs ACA International (“ACA”) and Specialized Collection Systems, Inc. (“SCS”) (collectively, “Plaintiffs”). The Motion seeks an Order from the Court preliminarily enjoining Consumer Financial Protection Bureau (“CFPB”) and its Director (combined “Defendants”) from enacting and enforcing the Prohibition on Creditors and Consumer Reporting Agencies Concerning Medical Information (the “Rule”), published in the Federal Register at 90 Fed. Reg. 3276, upon its effective date on March 17, 2025.

After consideration of the Motion and the Complaint, the Court determines that:

1. Pursuant to Fed. R. Civ. P. Rule 65(b), Plaintiffs have the express right to seek temporary injunctive relief from a court of competent jurisdiction pending hearing before a Judge;

2. Plaintiffs have alleged that immediate and irreparable injury, loss, and damage is threatened by the actions of Defendants, and Plaintiffs will suffer irreparable injury if the injunction is not granted;

3. The threatened injury to Plaintiffs outweighs any damage the injunction may cause Defendants;

4. The issuance of the injunction will not be adverse to the public's interest;

5. There is a substantial likelihood that Plaintiffs will prevail on the merits of their claims against Defendants;

6. Plaintiffs are prepared and capable of providing security for the requested relief. However, no such security is required;

7. Plaintiffs have notified Defendants of their request for a permanent injunction by personally serving Defendants and Defendants' counsel with a copy of Plaintiffs' Motion on Application for Preliminary Injunction; and

8. The order sought seeks to maintain the status quo between the parties by enjoining the enactment and enforcement of the Rule regarding Prohibition on Creditors and Consumer Reporting Agencies Concerning Medical Information, published in the Federal Register at 90 Fed. Reg. 3276 until such time as the permanent application can be heard and issued.

Plaintiffs are therefore entitled to a preliminary injunction against Defendants until such time as this Court orders otherwise.

IT IS HEREBY ORDERED, ADJUDGED AND DECREED THAT:

1. A Preliminary Injunction issue immediately.
2. Defendants, their officers, agents, heirs, servants, employees, successors and assigns, and those persons in active concert, participation, or privity with them, or any of them, are enjoined from bringing any action under the standards proscribed by the Rule;
3. The Preliminary Injunction shall remain in place until an order dissolving such injunction is issued by this Court.
4. Plaintiffs are granted leave to commence discovery in aid of permanent injunction proceedings before the Court.
5. Defendant shall show cause before this Court on _____ day of _____, 2025 at _____ o'clock __ a.m., or as soon thereafter as counsel may be heard, why a Permanent Injunction should not be ordered according to the terms and conditions set forth above.

DATED: _____, 2025

BY THE COURT:

United States District Court Judge